

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

JONATHAN CARBUCCIA,

Defendant.

INFORMATION

23 Cr.

93 CRIM 551

COUNT ONE

(Conspiracy to Commit Mail Theft and Receive Stolen Mail)

The United States Attorney charges:

1. In or about July 2023, in the Southern District of New York and elsewhere, JONATHAN CARBUCCIA, the defendant, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, to wit, theft and receipt of stolen mail matter, in violation of Title 18, United States Code, Section 1708.

2. It was a part and object of the conspiracy that JONATHAN CARBUCCIA, the defendant, and others known and unknown, knowingly stole, took, and abstracted, and by fraud and deception obtained, and attempted so to obtain, from and out of the mail, a post office, and a station thereof, a letter box, a mail receptacle, and a mail route and other authorized depository for mail matter, and from a letter and mail carrier, a letter, postal card, package, bag, and mail, and abstracted and removed from such letter, package, bag, and mail, an article and thing contained therein, and secreted, embezzled, and destroyed such letter, postal card, package, bag, and mail, and an article and thing contained therein, and stole, took, and abstracted, and by fraud and deception obtained a letter, postal card, package, bag, and mail, and an article and thing contained therein which had been left for collection upon and adjacent to a collection box and other authorized depository of mail matter, and bought, received, and concealed, and unlawfully had in

their possession, a letter, postal card, package, bag, and mail, and an article and thing contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, CARBUCCIA agreed to and did steal mail from a mailbox in New York, New York, in violation of Title 18, United States Code, Section 1708.

Overt Acts

3. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed in the Southern District of New York and elsewhere:

a. On or about July 25, 2023, JONATHAN CARBUCCIA, the defendant, and his co-conspirators approached United States Postal Service (“USPS”) mailboxes with the intent to steal mail.

b. On or about July 25, 2023, CARBUCCIA drove a vehicle in which his co-conspirators were passengers to multiple USPS mailboxes, and such vehicle contained stolen mail, stolen checks, and instruments used and intended to be used to steal mail.

c. On or about July 25, 2023, CARBUCCIA possessed instruments used and intended to be used to steal mail.

(Title 18, United States Code, Section 371.)

**FORFEITURE ALLEGATION**

4. As a result of committing the offense alleged in Count One of this Information, JONATHAN CARBUCCIA, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the

commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

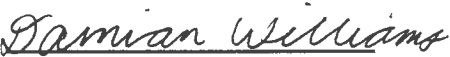
**Substitute Assets Provision**

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;  
Title 21, United States Code, Section 853; and  
Title 28, United States Code, Section 2461.)

  
DAMIAN WILLIAMS  
United States Attorney